



Driving progress
through partnership

Jordan W. Siev

Direct Phone: +1 212 205 6085

Email: jsiev@reedsmith.com

Reed Smith LLP
599 Lexington Avenue
New York, NY 10022-7650
+1 212 521 5400
Fax +1 212 521 5450
reedsmith.com

January 14, 2022

Via ECF

Hon. James L. Cott
United States Magistrate Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Dresser-Rand Co. v. Petróleos de Venezuela, S.A., et al, No. 19-cv-02689-LLS

Dear Judge Cott:

This firm represents plaintiff Dresser-Rand Company (“D-R”) in the above-referenced action. We write, pursuant to Your Honor’s Order dated January 10, 2022 (ECF No. 156), on behalf of both D-R and Defendant Petróleos de Venezuela, S.A. (“PDVSA”), to apprise the Court that the parties are in agreement that the inquest into attorneys’ fees and costs should not be stayed pending resolution of the appeal. Accordingly, the parties jointly respectfully request that the inquest into attorneys’ fees and costs not be stayed pending resolution of the appeal, but rather be promptly determined.

To that end, the parties propose the following briefing schedule, subject to Your Honor’s approval:

1. D-R’s moving brief shall be filed on or before February 11, 2022.
2. PDVSA’s opposition brief shall be filed within thirty days of the filing of D-R’s moving brief.
3. D-R’s reply brief shall be filed within fourteen days of the filing of PDVSA’s opposition brief.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Jordan W. Siev

Jordan W. Siev

cc: All Counsel of Record (via ECF)